

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Robert J. Beckley	:	Case No.17-70086-JAD
	:	Chapter 13
Debtor(s)	:	
Wells Fargo Bank, NA	:	
	:	Related to Document #80
Movant(s)	:	
	:	Hearing Date: 4/3/20 at 11:00 a.m.
vs.	:	
Robert J. Beckley	:	
Ronda J. Winnecour, Trustee	:	
	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY WITH 30-DAY WAIVER

RONDA J. WINNECOUR, Chapter 13 Trustee, responds as follows:

1. Wells Fargo Bank, NA requests relief from stay with regard to the property located at 220 Maple Avenue, Windber, PA 15963.
2. Movant filed a Notice of Mortgage Payment Change on November 15, 2018 changing the monthly mortgage payment to \$608.96.
3. Movant filed another Notice of Mortgage Payment Change on December 2, 2019 changing the monthly mortgage payment to \$596.17.
4. The Debtor never filed a Declaration in response to either Notice, and therefore they were not implemented.
5. The Trustee has since implemented the Notices as allowed by Local Rule 3002-4 in order to determine whether Movant's claim is in arrears.
6. The Trustee determined the Movant's claim is in arrears in the amount of \$7,366.17.
7. However, according to the Trustee's records, Movant shall receive at least

\$2,234.10 in the next distribution.

8. The Trustee suggests that Debtor file an amended plan to increase plan funding and provide for the Notices of Mortgage Payment Changes filed by Movant.

WHEREFORE, the Trustee so reports to the Court.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: March 6, 2020

By: /s/ Owen W. Katz
Owen W. Katz, PA I.D. 36473
Attorney for Chapter 13 Trustee
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CERTIFICATE OF SERVICE

I, the undersigned, certify that, in addition to ECF service on parties having entered their appearance in this case, I served or caused to be served on March 6, 2020, the foregoing document upon each of the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Office of the United States Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222-3721

Robert J. Beckley
220 Maple Avenue
Windber, PA 15963

Terry L. Graffius, Esquire
1397 Eisenhower Blvd.
Richland Square III, Suite 202
Johnstown, PA 15904

Karina Velter
Manley Deas Kochalski LLC
PO Box 165028
Columbus, OH 43216

/s/Rosa Richard
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